



284923

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION REPORT****I. HEADING**

Date: 4/5/99  
Subject: Allied Paper, Kalamazoo Co., Kalamazoo, Michigan  
From: Brad Stimple, U.S. EPA OSC, ERB, Response Section 3

To: W. Carney, U.S. EPA, ERB Chief, Chicago, IL  
L. Nachowicz, U.S. EPA, ERB, RS3, Chicago, IL  
B. Messenger, U.S. EPA, ERB, Chicago, IL  
K. Mould, OSWER, Washington, D.C.  
L. Johnson, U.S. EPA, ORC, Chicago, IL  
S. Hill, U.S. EPA, OPA, Chicago, IL  
J. Hahnenberg, U.S. EPA, RPM, Chicago, IL  
S. Cornelius, Superfund Section, ERD, MDEQ, Lansing, MI  
P. Krause, Environmental Health Dept., Kalamazoo, Co., Kalamazoo, MI  
L. Williams, U.S. Fish & Wildlife, Lansing, MI

POLREP Number: POLREP 10

**II. BACKGROUND**

Site No.: 059B	Start (Mobilization) Date: 8/3/98
EPA/IAG ID#: DW96947885-01-0	Completion Date: Ongoing
Response Authority: CERCLA (ERB)	Demobilization Date: NA
CERCLIS No.: MID006007306	NPL Status: Listed - August 1990

**III. SITE INFORMATION****A. Incident Category**

CERCLA incident category: Inactive Production Facility (Paper Mill)

**B. Site Description****1. Site Location**

The Allied Paper site is an operable unit of a larger NPL Superfund Site known as the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (AP/PC/KR). The 51-acre Allied Paper site is located along Portage Creek in a residential and commercial area within the city limits of Kalamazoo, Kalamazoo County, Michigan. Portage Creek flows into the Kalamazoo River approximately 3-miles downstream. The Kalamazoo River empties into Lake Michigan approximately 80-miles downstream.

Specifically, the Bryant Mill Pond area of the Allied Paper site is the primary focus of the time-critical removal action. Portage Creek flows in a northerly direction through the Bryant Mill Pond area. The mill pond was formed when a dam at Alcott Street was in use and water was impounded to approximately the 790-foot contour interval elevation. The 22-acre Bryant Mill Pond is no longer impounded. What remains is an exposed floodplain containing PCB contaminated residual paper pulp waste, soil and sediment resulting from mill wastewater discharge to Portage Creek.

(SEE POLREP 1 FOR ADDITIONAL INFORMATION)

## **2. Description of Threat**

(SEE POLREP 1 FOR DETAILED INFORMATION)

## **C. Preliminary Assessment/Site Inspection Results**

(SEE POLREP 1 FOR DETAILED INFORMATION)

# **IV. RESPONSE INFORMATION**

## **A. Situation**

### **1. Current Situation**

Weather conditions have been favorable. Dry, warm conditions have prevailed.

Excavation is complete along the entire west floodplain of Portage Creek. Excavation along the eastern floodplain and the creek bed is nearly complete. Approximately 20,000 cubic yards (CY) remains to be removed and consolidated. To date, PCB chemical analysis of soil confirmation samples have resulted in an average concentration range of approx. C.23ppm to 0.57ppm.

It is estimated that a total of 155,000 CY will be removed from the Bryant Mill Pond and consolidated. This exceeds the original estimate of 100,000 CY of material requiring removal. Flood plain excavation and diversion of Portage Creek back into original channel should be complete by May 1st.

Lagoon #6 has reached full capacity for now. Contaminated material has been consolidated into lagoons #5 and #3. Waste is currently being placed into lagoon #4.

NOTE : See attached site diagram.

### **2. Removal Activities to Date (3/13/99 to 4/3/99)**

The following removal activities have taken place during the reporting period:

- 1.) Approximately 135,000 cubic yards (CY) of PCB contaminated residual paper pulp waste and soil has been excavated from the Bryant Mill Pond and consolidated onsite.
- 2.) Confirmation sampling, re-excavation of hot spots as necessary, and backfill activities continue.
- 3.) Site crews completed construction of a new berm inside of lagoon #6 along the south side. The berm was completed to help maintain the structural integrity of the existing berm.
- 4.) Surface water sampling and analysis and field turbidity test. . . . downstream locations continues on an as needed basis.
- 5.) A draft restoration plan for the Bryant Mill Pond has been generated and submitted for review. Will begin soliciting bids for restoration work.
- 6.) U.S. ACE is in process of developing a SOW for stabilization of the consolidated waste (lagoons). Contractors will be invited to submit bid proposals for this project phase in the next several weeks.
- 7.) Water treatment activities continue on a 24/hr. basis. Approximately 2,000,000 gallons of water have been treated and discharged to date.
- 8.) As of last week, approximately 250,000 tons of backfill has been imported to the site.
- 9.) Drainage improvements have begun in all of the consolidation lagoons in an effort to promote dewatering of the waste material.

### 3. Enforcement

U.S. EPA and the PRP for the Allied Paper Operable Unit (AP OU), have entered into a CERCLA 122(h) "cash-out" settlement agreement. Pursuant to the terms of the agreement, the PRP will pay \$7.5 million to fund a U.S. EPA time-critical removal action at the Bryant Mill Pond portion of the AP OU of the AP/PC/KR NPL site. In exchange for the payment, the PRP will receive certain covenants not to sue under CERCLA.

(SEE POLREP 1 FOR DETAILED INFORMATION)

#### B. Planned Removal Activities

- \* Excavate contaminated soil and residual paper pulp waste from the Bryant Mill Pond (790 contour).
- \* Transport material to consolidation area. Stabilize and grade waste as necessary.
- \* Perform confirmation sampling. Backfill excavation area.
- \* Dewater excavation area as necessary. Treat water on-site and discharge as necessary.
- \* Perform personnel and perimeter air monitoring throughout project.
- \* Maintain site haul roads and stabilize lagoon slopes as necessary.
- \* Cover consolidation area as appropriate.
- \* Perform restoration activities of the Bryant Mill Pond as appropriate.

#### C. Next Steps (for next reporting period)

- \* Complete excavation of remaining east flood plain and creek bed.
- \* Divert creek back into it's original channel. Begin erosion control activities.
- \* Treat, sample and discharge contaminated water (24/hrs a day).
- \* Continue confirmation sampling and backfill activities.
- \* Generate SOW for waste dewatering and stabilization.

#### D. Key Issues

A technical meeting with the PRP and consultant representatives took place on 3/31/99. The agenda primarily focused on removal tasks to be completed and expected results. Will work toward attaining mutual agreement of remaining removal activities as stipulated by the settlement agreement.

Site removal costs are rapidly approaching the project budget. Will have to closely evaluate costs and completion durations of different waste dewatering/ stabilization techniques to determine an appropriate approach for this project phase.

#### .. COST INFORMATION (approximate totals as of 4/2/99)

	CEILING	COSTS
U.S. ACE (Weston)	\$7,500,000	\$5,394,300
U.S. EPA	\$ 150,000	\$ TBD

### VI. DISPOSITION OF WASTES

No off-site disposal of waste planned.

# USEPA Removal Action Allied Paper Operable Unit Site Kalamazoo, MI

